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27 March 2007

Mr. Gary Miller
Task Order Monitor
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Subject: Technical Review
Data Completeness Evaluation (5 March 2007)
Gulfco Marine Maintenance Site RI/FS Oversight
U.S. Environmental Protection Agency Region 6
Remedial Action Contract 2
Contract: EP-W-06-004
Task Order: 0006-RSBD-06JZ

Dear Mr. Miller:

Per direction from the U.S. Environmental Protection Agency (EPA), EA Engineering, Science, and Technology, Inc. (EA) conducted a technical review of the data completeness evaluation prepared by Pastor, Behling & Wheeler, LLC (PBW) for the Gulfco Marine Maintenance Superfund (Gulfco) site, Freeport, Texas (submitted to EPA on 5 March 2007). EA reviewed the following components of the PBW submittal:

- Letter report entitled *R-flagged Analytical Results for Antimony in Soils*, prepared by Quality Assurance Associates (QAA) (dated 1 March 2007).
- Table prepared by PBW summarizing those data sets that did not meet target completeness criteria, an assessment of the implications for the risk assessment/nature and extent evaluation, and proposed corrective actions, where appropriate.

The proposed corrective actions are considered to be appropriate for those data sets that (1) did not meet target completeness criteria and (2) do not significantly impact the risk assessment/nature and extent evaluation. With regard to the rejected (R-flagged) data for antimony in soils, EA considers QAA's supplemental evaluation to be adequate in accordance with the following EPA guidance documents:

- EPA. 2004. *Contract Laboratory Program National Functional Guidelines for Inorganic Data Review*. Final. EPA-540-R-04-004. Office of Superfund Remediation and Technology Innovation. Washington, D.C. October.

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- EPA. 1992. *Guidance for Data Useability in Risk Assessment (Part A)*. Final. EPA 9285.7-09A. Office of Emergency and Remedial Response. Washington, D.C. April.

EA will also transmit an electronic version of this submittal to EPA via e-mail.

If you have any questions regarding this submittal, please call me at (972) 459-5040.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luis Vega', with a stylized, cursive script.

Luis Vega
Project Manager

cc: Cora Stanley, EPA Contracting Officer (letter only)
Rena McClurg, EPA Project Officer (letter only)
Fritz Meyer, EA Program Manager (letter only via e-mail)
Jeff Hills, EA Financial Manager (letter only via e-mail)
File

